

**REMARKS**

Claims 1, 3-13, 15-18 and 20-29 are pending. Claims 27-29 have been added herein. Support for the new claims is set forth at page 12, line 26 to page 13, line 21 of the specification. Applicants' representatives thank Ex. Thornton for the courtesies extended to the undersigned attorney during the interview conducted on December 14, 2005. Applicants' separate record of the substance of that interview is incorporated into the following remarks.

**Applicants' Response to the Rejections under 35 U.S.C. §103**

The rejection of claims 1, 3-13, 15-18, and 19-23 has been maintained under 35 U.S.C. §103(a) as being unpatentable over *Lipson et al.* (EP 128014 A2) in view of *Ishikawa et al.* (JP 10-020491 A). The Office Action states that one skilled in the art would have found it obvious to utilize the compounds of *Lipson et al.* with the 2,4,5-triarylimidazole dimers of *Ishikawa*.

In regard to claims 1, 3-13, 15-18, 19-23, applicants respectfully submit that the present invention is not obvious over Lipson in view of Ishikawa et al. because there are surprising results of excellence in both adhesion and prevention of scum which outweigh any possible obviousness of making the combination. The previous §132 Declarations have been deemed insufficient for not being commensurate in scope with the instant claims, because it only utilizes 2-(o-chloropheny)-4,5-dipenyylimidazole dimer which may produce the enhanced results. The Office Action states that the enhanced results may be linked to the specific use of 2-(o-chlorophenyl)-4, 5-dipenyylimidazole dimer because it was the standard component (B) for the examples. The Examiner also states that Example V of *Lipson* should be used rather than the composition of Example 1 of the present specification.

As discussed during the interview, applicants provided a listing of components which have been found sufficiently comparable to the cited prior art. Applicants have conducted

experiments utilizing the components and the results are set forth in of the accompanying Declaration under 37 C.F.R. §1.132. As set forth in the declaration, it is applicants' claimed components which result in both excellence in adhesion and preventing of scum. Further, applicants refer to Section 4 and the table on page 7 of the accompanying Declaration under 37 C.F.R. §1.132.

The Office Action also asserts that one skilled in the art would be motivated to modify *Lipson et al.* by incorporating a compound of general formula (I) into the taught composition "in order to increase the sensitivity, intensity and elongation of the hardened film." The Office Action points to paragraph [0015] of *Ishikawa* as providing this motivation. As discussed during the interview reviewed, the machine translation of paragraph [0015] is difficult to read. Hence, applicants have provided herein an explanation and better translation of paragraph [0015].

In regard to claims 3, 15 and 20, specifically, there is no motivation to one skilled in the art to combine the formula as set forth in General formula I and II of *Ishikawa* with *Lipson et al.* The paragraph cited by the Office Action, [0015], when properly translated, does not provide motivation to combine. The paragraph is referring to amounts of general formula (I) in component (C) based on total weight of components (A), (C) and (D). The amount of the formula in the specific combination, results in the "sufficient strength and elongation."

Claims 24-26 stand rejected under 35 U.S.C. § 103(a) as being obvious over *Lipson et al.* in view of *Ishikawa* as applied to claims 1, 3-13, 15-18 and 20-23, and further in view of *Kawashima*. Applicants respectfully submit that the claims are addressed, as set forth above, by nature of their dependency. Further, applicants refer to Section 5 and the table on page 7 of the accompanying Declaration under 37 C.F.R. §1.132.

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In view of the aforementioned accompanying remarks and accompanying Declaration under 37 C.F.R. §1.132, Applicants submit that the claims are in condition for allowance. Applicants request such action at an early date.

If the Examiner believes that this application is not now in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney to arrange for an interview to expedite the disposition of this case.

If this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. The fees for such an extension or any other fees that may be due with respect to this paper may be charged to Deposit Account No. 50-2866.

Respectfully submitted,

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### **ATTACHMENTS**

1. Verification of Translation
2. Declaration Under 37 C.F.R. 1.132